



## U.S. Department of Justice

United States Attorney  
Southern District of New York

---

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

September 21, 2021

**VIA ECF**

The Honorable Mary Kay Vyskocil  
United States District Court  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

**Re:     *United States v. Navarro et al., 20 Cr. 160 (MKV)***

Dear Judge Vyskocil:

The Government respectfully writes, upon consent of counsel for Seth Fishman, Jordan Fishman, and Lisa Giannelli, to propose the following pretrial dates in advance of the first trial in this case. As discussed at the most recent pretrial conference, the parties have built the following proposed schedule starting from a January 17, 2022, start date for the trial itself. The parties' proposal is as follows:

1. The Government will begin producing stamped 3500 material and Government Exhibits as of November 1, 2021, and will plan to complete production of materials in the Government's possession and identified as Government Exhibits as of January 3, 2021, on that day.<sup>1</sup>
2. November 17, 2021 will be the date for the disclosure of expert witnesses.
3. Motions *in limine* will be filed on December 1, 2021.
4. Oppositions to any motions *in limine* will be filed on December 15, 2021.
5. Replies in support of motions *in limine* will be filed on December 22, 2021.

[Continued on the following page]

---

<sup>1</sup> The Government notes that 3500 material, in particular, will continue to be created in the period prior to trial as the Government speaks with witnesses. Materials not available or identified as exhibits as of January 3, 2022, will be produced forthwith upon their creation or identification after January 3, 2022.

6. Proposed voir dire and requests to charge will be filed on January 3, 2022.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

by: /s/ Andrew Adams  
Sarah Mortazavi  
Andrew Adams  
Assistant United States Attorneys  
212-637-2520 / 2340